

**From:** [White, Conor](#)  
**To:** "Randy Pulman"  
**Cc:** [Rukavina, Davor](#); [MaryAnn Villa](#); [Vasek, Julian](#); [Jamie Gonzales](#)  
**Subject:** RE: UFS Discovery Upload Link  
**Date:** Wednesday, March 20, 2024 9:06:00 AM

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Randy,

Following up on this - please advise if you have received any updates from your client. Thank you.

Regards,

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**From:** Randy Pulman <[RPulman@pulmanlaw.com](mailto:RPulman@pulmanlaw.com)>  
**Sent:** Friday, March 8, 2024 3:17 PM  
**To:** White, Conor <[cwhite@munsch.com](mailto:cwhite@munsch.com)>  
**Cc:** Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)>; MaryAnn Villa <[mvilla@pulmanlaw.com](mailto:mvilla@pulmanlaw.com)>; Vasek, Julian <[jvasek@munsch.com](mailto:jvasek@munsch.com)>; Jamie Gonzales <[JGonzales@pulmanlaw.com](mailto:JGonzales@pulmanlaw.com)>  
**Subject:** RE: UFS Discovery Upload Link

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Conor:

The client confirms that payroll stops on the dates reflected in the income statement we sent to you which I believe as April 2023 when the entity ceased operations.

With respect to the bank statements prior to 2022, the client changed accounting systems and no longer has access to those statements. I suspect those statements will have to be retrieved from the Bank. I will ask the client to go back and try to find the June 2023 statement which we apparently did not produce.

With respect to the tax returns, I will have to confirm its existence with the client, but I suspect that this was a wholly owned pass-through entity which prepared no separate tax return. I will go back to the client and confirm whether a tax return was prepared.

RAP

Randall A. Pulman  
Pulman, Cappuccio & Pullen, LLP  
2161 NW Military Highway, Suite 400  
San Antonio, Texas 78213  
210-222-9494  
210-892-0420(direct)  
210-892-1610(fax)  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)  
[www.pulmanlaw.com](http://www.pulmanlaw.com)



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**From:** White, Conor <[cwhite@munsch.com](mailto:cwhite@munsch.com)>

Trustee's  
Ex. C

**Sent:** Thursday, March 7, 2024 12:53 PM

**To:** Randy Pulman <[RPulman@pulmanlaw.com](mailto:RPulman@pulmanlaw.com)>

**Cc:** Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)>; MaryAnn Villa <[mvilla@pulmanlaw.com](mailto:mvilla@pulmanlaw.com)>; Vasek, Julian <[jvasek@munsch.com](mailto:jvasek@munsch.com)>; Jamie Gonzales <[JGonzales@pulmanlaw.com](mailto:JGonzales@pulmanlaw.com)>

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Thank you, Randy. I forgot to mention, but if you could just get confirmation that UFS canceled its payroll account in April of 2023 (we don't have any after then) and inquire on statements for January and February of this year, as well. Appreciate the assistance.

**Conor P. White**

Munsch Hardt Kopf & Harr, P.C.  
500 N. Akard Street, Suite 4000 / Dallas, Texas 75201-6605

Direct: +1.214.880.1085 / [cwhite@munsch.com](mailto:cwhite@munsch.com) / [munsch.com](http://munsch.com)

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**From:** Randy Pulman <[RPulman@pulmanlaw.com](mailto:RPulman@pulmanlaw.com)>

**Sent:** Thursday, March 7, 2024 12:35 PM

**To:** White, Conor <[cwhite@munsch.com](mailto:cwhite@munsch.com)>

**Cc:** Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)>; MaryAnn Villa <[mvilla@pulmanlaw.com](mailto:mvilla@pulmanlaw.com)>; Vasek, Julian <[jvasek@munsch.com](mailto:jvasek@munsch.com)>; Jamie Gonzales <[JGonzales@pulmanlaw.com](mailto:JGonzales@pulmanlaw.com)>

**Subject:** RE: UFS Discovery Upload Link

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I have passed this back to the client and will let you know.

Randall A. Pulman  
Pulman, Cappuccio & Pullen, LLP  
2161 NW Military Highway, Suite 400  
San Antonio, Texas 78213  
210-222-9494  
210-892-0420(direct)  
210-892-1610(fax)  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)  
[www.pulmanlaw.com](http://www.pulmanlaw.com)



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**From:** White, Conor <[cwhite@munsch.com](mailto:cwhite@munsch.com)>

**Sent:** Thursday, March 7, 2024 12:26 PM

**To:** Randy Pulman <[RPulman@pulmanlaw.com](mailto:RPulman@pulmanlaw.com)>

**Cc:** Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)>; MaryAnn Villa <[mvilla@pulmanlaw.com](mailto:mvilla@pulmanlaw.com)>; Vasek, Julian <[jvasek@munsch.com](mailto:jvasek@munsch.com)>; Jamie Gonzales <[JGonzales@pulmanlaw.com](mailto:JGonzales@pulmanlaw.com)>

**Subject:** RE: UFS Discovery Upload Link

Randy,

We've had a chance to look over the documents provided in the link and irrespective of the emails we discussed, it looks like we're still missing several groups of key documents requested in the RFPs. Some of the notable ones, for example, include bank statements prior to 2022 (and for June of 2023) and UFS's tax returns.

When do you anticipate being able to supplement the missing bank statements or other documents?

Regards,

**Conor P. White**

Munsch Hardt Kopf & Harr, P.C.  
500 N. Akard Street, Suite 4000 / Dallas, Texas 75201-6605

Direct: +1.214.880.1085 / [cwhite@munsch.com](mailto:cwhite@munsch.com) / [munsch.com](http://munsch.com)

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**From:** Jamie Gonzales <[JGonzales@pulmanlaw.com](mailto:JGonzales@pulmanlaw.com)>

**Sent:** Wednesday, March 6, 2024 2:12 PM

**To:** White, Conor <[cwhite@munsch.com](mailto:cwhite@munsch.com)>; Randy Pulman <[RPulman@pulmanlaw.com](mailto:RPulman@pulmanlaw.com)>

**Cc:** Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)>; MaryAnn Villa <[mvilla@pulmanlaw.com](mailto:mvilla@pulmanlaw.com)>

**Subject:** RE: UFS Discovery Upload Link

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I have uploaded documents to the ShareFile link. There should be 64 pdf files and 7 Excel worksheets for a total of 71 documents. The pdf files have a bates label on them with Seidel UFS 1-655. Let me know if you have any questions. Thank you.

*Jamie Gonzales*

Legal Assistant to

Randall Pulman

Shari P. Pulman

Pulman, Cappuccio & Pullen, LLP

2161 NW Military Hwy, Suite 400

San Antonio, Texas 78213

Telephone: (210) 222-9494, ext. 101

Facsimile: (210) 892-1610

[www.jgonzales@pulmanlaw.com](mailto:www.jgonzales@pulmanlaw.com)

[www.pulmanlaw.com](http://www.pulmanlaw.com)

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**From:** White, Conor <[cwhite@munsch.com](mailto:cwhite@munsch.com)>

**Sent:** Wednesday, March 6, 2024 1:25 PM

**To:** Randy Pulman <[RPulman@pulmanlaw.com](mailto:RPulman@pulmanlaw.com)>; Jamie Gonzales <[JGonzales@pulmanlaw.com](mailto:JGonzales@pulmanlaw.com)>

**Cc:** Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)>

**Subject:** UFS Discovery Upload Link

Randy,

Thanks for your call earlier. Below is a link to a ShareFile where you should be able to upload the documents collected so far. Please let me know if you have any issues accessing or uploading docs to the link.

<https://munsch.sharefile.com/i/i66b35ded0fb44c7b>

Regards,

**Conor P. White**

Munsch Hardt Kopf & Harr, P.C.  
500 N. Akard Street, Suite 4000 / Dallas, Texas 75201-6605

Direct: +1.214.880.1085 / [cwhite@munsch.com](mailto:cwhite@munsch.com) / [munsch.com](http://munsch.com)

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